

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as
Administratrix of the Estate of EVELINE
BARROS-CEPEDA,
Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the CITY
OF BOSTON,
Defendants.

**DEFENDANTS CITY OF BOSTON'S AND THOMAS TAYLOR'S MOTION TO
COMPEL DEPOSITIONS pursuant to fed. R. civ. P. 37 AND PROPOSED SCHEDULE
OF WITNESS DEPOSITIONS PURSUANT TO THIS COURT'S december 20, 2007 order**

Defendants, City of Boston and Thomas Taylor, Jr. ("Defendants"), move this Honorable Court to compel the attendance of several relevant and percipient witnesses, including Maria DaRosa, Luis Carvalho, Carlos Fernandes, and Travo Carter. Additionally, the Defendants submit their proposed list and schedule of upcoming depositions.

In further support of said motion, the Defendants attach the accompanying Memorandum of Law.

WHEREFORE: The Defendants City of Boston and Thomas Taylor, Jr. respectfully requests that this Honorable Court allow their motion.

Respectfully submitted,
DEFENDANTS, THOMAS TAYLOR, JR.
AND CITY OF BOSTON,

By their attorneys:

/s/ Helen G. Litsas

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CERTIFICATE OF SERVICE

I, Helen G. Litsas, hereby certify that on this date I served a copy of the foregoing documents upon lead plaintiff's counsel, Andrew Stockwell-Alpert, by electronic filing and by postage prepaid, first class, U.S. Mail.

12/21/07 /s/ Helen G. Litsas

Date Helen G. Litsas

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Pursuant to L.R. D. Mass. 7.1(A)(2), I hereby certify that on December 19, 2007, I communicated with Plaintiff's Attorney, Andrew Stockwell-Alpert, regarding *Defendants Thomas Taylor and City of Boston's Motion To Compel*, and we were unable to narrow the issues.

12/21/07 /s/ Helen G. Litsas

Date Helen G. Litsas